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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Cung Le, Nathan Quarry, Jon Fitch, on behalf of themselves and all others similarly situated.

Case No. 5:14-cv-05484-EJD
5:14-cv-05591- EJD
5:14-cv-05621- EJD

Plaintiffs,

10

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC.**

**DECLARATION OF JOSEPH R. SAVERI IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO UFC's ADMINISTRATIVE MOTION TO
ADVANCE HEARING DATE**

Defendant.

**Luis Javier Vazquez and Dennis Lloyd Hallman,
on behalf of themselves and all others similarly
situated.**

Plaintiffs.

V

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC.**

Defendant.

**Brandon Vera and Pablo Garza, on behalf of
themselves and all others similarly situated.**

Plaintiffs

V

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC.**

Defendant

Case No. 5:14-cv-05484-EJD
Case No. 5:14-cv-05591-EJD
Case No. 5:14-cv-05621-EJD

1 I, Joseph R. Saveri, declare:

2 1. I am the Founding Partner of the Joseph Saveri Law Firm, Inc. ("JSLF"). I am an attorney
3 of record in these related matters for Plaintiffs Le, Quarry, Fitch, Vazquez, Hallman, Vera and Garza and
4 a member in good standing with the State Bar of California. I submit this Declaration in support of
5 Plaintiffs' Opposition to the UFC's¹ Administrative Motion to Advance Hearing Date. Unless otherwise
6 stated, I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could
7 and would testify competently to them.

8 2. I conferred by telephone and email with counsel for UFC prior to entry of the stipulation
9 on January 16 extending UFC's time to respond to the Complaints filed by Plaintiffs. *See* Docket No. 26.
10 This stipulation represents the result of extensive negotiation between, and ultimately, the agreement of
11 Plaintiffs and UFC. In particular, the negotiations resulted in an agreement whereby Plaintiffs agreed to
12 give UFC more time to prepare motions or other responses to the Complaints and provided both parties
13 additional time to fully brief the issues raised by such motions and responses. The draft stipulation was
14 drafted and re-drafted, reflecting the negotiation. The final [Proposed] Stipulation and Order Extending
15 Response Deadlines, entered as an Order in the Court's docket on January 16, 2015 (Dct. 26) (the
16 "Stipulation"), represents the fully negotiated agreement of the parties.

17 3. On January 26, 2015 counsel for UFC represented to me that UFC had drafted a motion to
18 transfer, and asked Plaintiffs to agree to have the transfer motion heard on March 26, 2015. Prior to
19 January 26, counsel for UFC had expressed no intention to have a transfer motion heard before May 7,
20 the date set for the Case Management Conference. Plaintiffs were not informed prior to January 26 that
21 the UFC intended to file a motion to transfer prior to filing other motions responsive to the Complaints.

22 4. On January 27, I informed counsel for UFC that the Stipulation provided the schedule for
23 UFC's transfer motion, as well as any other motion that UFC would bring in response to the Complaints.

24 5. Attached at Exhibit 1 is a true and correct copy of a subpoena served by JSLF on Twitter,
25 Inc. ("Twitter") on or about January 8, 2015

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27
28 ¹ Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC ("UFC").

6. Attached at Exhibit 2 is a true and correct copy of a subpoena served by JSLF on Google, Inc. (“Google”) on or about January 7, 2015.

7. JSLF served subpoenas on Twitter and Google because it was informed that UFC President Dana White deleted “tweets” from his account immediately after the *Le* Complaint was filed.

8. In addition to Twitter and Google, and named Plaintiff Mr. Le, JSLF is aware of several other witnesses who reside in the Northern District of California. On information and belief, Scott Coker, the founder of former UFC competitor Strikeforce, and current president of Bellator, operated Strikeforce from San Jose; Malcolm Bordelon, the Executive Vice President of Business Operations at Sharks Sports & Entertainment, fka Silicon Valley Sports & Entertainment (which had an ownership interest in Strikeforce), resides in or around San Jose; Finally, Electronic Artists (“EA”) Sports, which created a UFC video game, has offices in this District. Additionally, several class members reside in this District

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in San Francisco, California on February 2, 2015.

/s/ Joseph R. Saveri
Joseph R. Saveri